IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

HATTIE WILLIAMS,   )
)
           Plaintiff,   )
)
v.   )   CIVIL ACTION FILE NO.
)   NO: 1:09-cv-2162-BBM
WAL-MART STORES EAST, LP,   )
NOLAN BOOKER and   )
JOHN DOES 1-4,   )
)
           Defendants.   )

CONSENT PROTECTIVE ORDER

1.

By agreement of the parties, and for good cause, the Court finds that a protective

order should be entered pursuant to O.C.G.A. §9-11-26 for the purpose of protecting

commercial and confidential information and trade secrets of Defendant Wal-Mart Stores

East, LP (hereinafter "Defendant").

2.

This protective order shall apply to the production of Defendant's corporate policies

and, particularly material reflecting or related to standard policies and procedures and

training materials, which are produced pursuant to Plaintiff's First Interrogatories and

Request For Production of Documents to Defendant Wal-Mart Stores East, LP. Said

documents and materials shall be marked "CONFIDENTIAL".

3.

No document, deposition, or tangible thing or other information described in

Paragraph 1 may be disclosed to any person, except for the following: counsel of record;

persons assisting counsel of record, including outside experts and consultants; directors,

officers, and employees of any party; and employees of any party's attorney to whom it is necessary that the material be disclosed for purposes of this litigation.

For purposes of any disclosures to persons assisting counsel of record; outside experts or consultants; directors, officers and employees of any party; and employees of any party's attorneys, the party making such a disclosure must: obtain an agreement in writing from the persons assisting counsel, including outside experts or consultants, or officers of employees of either party, reciting that he or she has read a copy of this Protective Order and agrees to be bound by its provisions.

4.

Each party agrees that before filing with the Clerk of Court any paper (including, without limitation, an affidavit, memorandum, or motion) that discloses directly or indirectly all or part of any document described in paragraph 2 above, such paper shall be filed under seal and labeled "CONFIDENTIAL".

5.

All such documents and materials produced by defendant to counsel for plaintiff pursuant to paragraph 2 above shall be used only in the course of the above-captioned proceedings and shall not be used or provided for use in any other litigation or proceedings.

6.

The documents and materials produced by defendant to counsel for plaintiff pursuant to paragraph 2 above shall not be published, orally, by copy, or by any other means, to any person.

7.

Upon conclusion of this action, counsel for plaintiff shall return to counsel for defendant the original and all copies made of such documents and materials described in paragraph 2 above.

8.

After the final termination of this action, the restrictions on communication and disclosure provided for herein shall continue to be binding upon the parties and all other persons to whom documents designated as confidential or information contained therein have been communicated or disclosed pursuant to the provisions of this Order or any other order of this Court.

9.

It is understood that if any party violates this Protective Order, said party shall be subjected to pay a penalty to Wal-Mart Stores East, LP, of not less than One Thousand and no/100 ($1,000.00) Dollars, any attorneys fees or expenses associated in the prosecution of said violation, and any other sanctions that the Court finds appropriate under the circumstances.

SO ORDERED this 27th day of August, 2009.

s/Beverly B. Martin
Judge Beverly B. Martin
United States District Court

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CONSENTED TO:

/s/ Michael D. St. Amand
(By Albert J. DeCusati, with express permission)
Michael D. St. Amand, Esq.
Todd M. Yates, Esq.
Attorneys for Plaintiff

/s/ Albert J. DeCusati
Albert J. DeCusati, Esq.
Attorney for Defendant

I certify that the originally executed document contains the signatures of all filers indicated herein and therefore represents consent for filing of this document.